

1                   **RICHARD E. TANASI, ESQ.**  
2                   Nevada Bar No. 9699  
3                   **TANASI LAW OFFICES**  
4                   8716 Spanish Ridge Ave., Ste. 105  
5                   Las Vegas, NV 89148  
6                   Telephone: (702) 906-2411  
7                   Facsimile: (866) 299-5274  
8                   Email: rtanasi@tanasilaw.com  
9                   *Attorney for Defendant*

10                  **UNITED STATES DISTRICT COURT**  
11                  **DISTRICT OF NEVADA**

12                  UNITED STATES OF NEVADA,  
13                  vs.  
14                  Plaintiff,  
15                  Marlon Echon Melu, et al  
16                  Defendant.

17                  Case No: 2:19-cr-00300-04-JCM-EJY

18                  **SEALED STIPULATION AND ORDER**  
19                  **TO CONTINUE SENTENCING**  
20                  **HEARING (Fifth Request)**

21                  IT IS HEREBY STIPULATED AND AGREED, by and between the United States of  
22                  America, by and through Simon F. Kung, Assistant United States Attorney, MARLON ECHON  
23                  MELU, by and through her attorney, Richard E. Tanasi, Esq., that the Sentencing Hearing in the  
24                  above-captioned matter, now scheduled for **January 19, 2022** at the hour of 10:00 a.m., be  
25                  vacated and continued to a time convenient for the Court sixty (60) days after **February 28, 2022**.

26                  Pursuant to General Order No. 2007-04, this Stipulation is entered into for the following  
27                  reasons:

28                  1.         The parties need more time for Mr. Melu to cooperate with the government.  
29  
30                  2.         Mr. Melu is out of custody and does not object to this continuance.  
31  
32                  3.         The additional time requested herein is not sought for purposes of delay.  
33  
34                  4.         Additionally, denial of this request for continuance could result in a miscarriage  
35                  of justice.

1                   **WHEREFORE**, the parties respectfully request that this Honorable Court accept the  
2 Stipulation and enter an Order as set forth below, continuing the sentencing hearing for date  
3 convenient to the Court, sixty (60) days after February 28, 2022.

4                   DATED this 3<sup>rd</sup> day of January, 2022.  
5  
6 U.S. ATTORNEY'S OFFICE  
7  
8                   /s/ Simon F.Kung  
9                   Simon F. Kung  
10                  Assistant United States Attorney  
11                  501 Las Vegas Boulevard South  
12                  Suite 1100  
13                  Las Vegas, NV 89101  
14                  [simon.kung@usdoj.gov](mailto:simon.kung@usdoj.gov)  
15                  Attorney for the UNITED STATES  
16  
17                  /s/ Richard Tanasi  
18                  RICHARD E. TANASI, ESQ.  
19                  Attorney for the Defendant  
20                  ///  
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TANASI LAW OFFICES  
8716 Spanish Ridge Ave., Ste. 105  
Las Vegas, Nevada 89148  
702-906-2411 • Fax 866-299-5274

1 UNITED STATES DISTRICT COURT  
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4 DISTRICT OF NEVADA  
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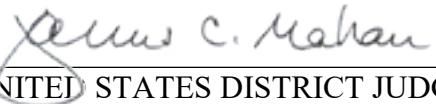
7 UNITED STATES OF NEVADA,  
8 Plaintiff,  
9 vs.  
10 Marlon Echon Melu, et al  
11 Defendant.

12 } Case No: 2:19-cr-00300-04-JCM-EJY  
13 }  
14 } **SEALED ORDER ON STIPULATION**  
15 }

16 This matter coming before the Court on Stipulation to Continue Sentencing Hearing, the  
17 Court having considered the matter, and good cause showing, the Court accepts the Stipulation.

18 **WHEREFORE, IT IS HEREBY ORDERED,** that the Sentencing Hearing in the  
19 above-captioned matter, now scheduled for **January 19, 2022**, at the hour of 10:00 a.m., be  
20 vacated and continued to April 29, 2022 at 10:00 a.m. in courtroom 6A.

21 Dated: January 5, 2022.

22   
23 JAMES C. MAHAN  
24 UNITED STATES DISTRICT JUDGE

25 TANASI LAW OFFICES  
26 8716 Spanish Ridge Ave., Ste. 105  
27 Las Vegas, Nevada 89148  
28 702-906-2411 • Fax 866-299-5274

## **CERTIFICATE OF ELECTRONIC SERVICE**

I HEREBY CERTIFY that I am an employee of Tanasi Law Offices, that on the 3<sup>rd</sup> day of January 2022, the undersigned served a true and correct copy the foregoing **STIPULATION AND ORDER** by U.S. District Court CM/EMF Electronic Filing to:

Simon F. Kung  
Assistant United States Attorney  
501 Las Vegas Boulevard South  
Suite 1100  
Las Vegas, NV 89101  
[simon.kung@usdoj.gov](mailto:simon.kung@usdoj.gov)  
Attorney for the UNITED STATES

**Attorney for the UNITED STATES**

/s/ Richard Tanasi  
An employee of TANASI LAW OFFICES

**TANASI LAW OFFICES**  
8716 Spanish Ridge Ave., Ste. 105  
Las Vegas, Nevada 89148